

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

|  |   |                           |
|--|---|---------------------------|
| In re:   | ) |                           |
|  | ) | Chapter 11                |
|  | ) |                           |
| MINING PROJECT WIND DOWN HOLDINGS, INC.                            | ) | Case No. 22-90273 (MI)    |
| (f/k/a Compute North Holdings, Inc.), <i>et al.</i> , <sup>1</sup> | ) |                           |
|  | ) |                           |
| Debtors.   | ) | (Jointly Administered)    |
|  | ) | <b>Re: Docket No. 759</b> |

---

**CERTIFICATE OF NO OBJECTION  
REGARDING APPLICATION TO EMPLOY FERGUSON BRASWELL FRASER  
KUBASTA PC AS COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION**

---

Pursuant to the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned representatives of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and its affiliates (collectively, the “Debtors”) certify as follows:

1. On December 29, 2022, the Debtors filed their *Application of Debtors and Debtors in Possession to Employ Ferguson Braswell Fraser Kubasta PC as Efficiency Counsel for the Debtors and Debtors in Possession Effective as of December 7, 2022* (the “Application”) [Docket No. 759].

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors’ service address for the purposes of these chapter 11 cases is 300 North LaSalle, Suite 1420, Chicago, Illinois 60654.

2. The Application was served on all parties receiving electronic notice in this case via ECF and on the parties set forth on the Certificate of Service of the Application.

3. The deadline for parties to file a response to the Application was January 19, 2023 (the “Objection Deadline”). More than 24 hours have passed since the Objection Deadline. Counsel for the Debtors has reviewed the Court’s docket and no objection/response to the Motion appears thereon. Counsel for the Debtors has not received any objection or response to the Motion, and is not aware of any such objection or response. The United States Trustee for the Southern District of Texas has informed the Debtors that it has reviewed the Application and has no comments.

4. Attached hereto as **Exhibit A** is the proposed form of order granting the requested relief in the Motion (the “Proposed Order”). Attached hereto as **Exhibit B** is a redline of the Proposed Order reflecting non-substantive changes between the Proposed Order and the proposed order attached to the Motion.

**WHEREFORE**, the Debtors respectfully request that the Court enter the Proposed Order, granting the relief requested in the Motion, and granting such other and further relief as the Court may deem proper.

*[Remainder of Page Intentionally Left Blank]*

Respectfully submitted,

Dated: January 20, 2023  
Houston, Texas

*/s/ James T. Grogan III*

---

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Luc Despins (admitted *pro hac vice*)  
Sayan Bhattacharyya (admitted *pro hac vice*)  
Daniel Ginsberg (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: lucdespins@paulhastings.com  
sayanbhattacharyya@paulhastings.com  
danielginsberg@paulhastings.com

-and-

Matthew Micheli (admitted *pro hac vice*)  
Michael Jones (admitted *pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
Telephone: (312) 499-6000  
Facsimile: (312) 499-6100  
Email: mattmicheli@paulhastings.com  
michaeljones@paulhastings.com

*Counsel to the Debtors and Debtors in Possession*